

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	) <b>Bankruptcy Case No. 24-21618-CMB</b>
Gerald W. Shaffer Jr. and	)
Sandra D. Shaffer,	) <b>Chapter 13</b>
<b>Debtors,</b>	)
	)
U.S. Bank National Association, not in	) <b>Claim No. 15</b>
its individual capacity but solely in its	)
capacity as Indenture Trustee of	)
CIM Trust 2021-NR4,	)
<b>Movant,</b>	)
<b>vs.</b>	)
Gerald W. Shaffer Jr. and	)
Sandra D. Shaffer,	)
<b>Respondents.</b>	) <b>Document No.</b>

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE**  
**(PLAN IS SUFFICIENT)**

1. On July 2, 2024, Gerald W. Shaffer Jr. and Sandra D. Shaffer (the “Debtors”) filed a chapter 13 bankruptcy in the United States Bankruptcy Court for the Western District of Pennsylvania.

2. On July 16, 2024, the Debtors filed their Chapter 13 Plan (the “Plan”). See  
Doc. No. 18.

3. On September 27, 2024, the Court confirmed the Plan on a final basis. See  
Doc. No. 44.

4. On January 30, 2025, U.S. Bank National Association, not in its individual capacity but solely in its capacity but solely in its capacity as Indenture Trustee of CIM Trust 2021-NR4 filed a Notice of Mortgage Payment Change. The change is based on a change in the escrow account from \$313.47 to \$317.72, an increase of \$4.25. In total, the new total payment is \$810.45.

5. According to the confirmed Plan, U.S. Bank is being paid pursuant to the Loss Mitigation Program which requires the full payment of escrow.

6. The increase is nominal and the confirmed Plan should be sufficient to accommodate the proposed increase. The Trustee should be authorized to make the increase.

7. The Debtors are current on their Plan payments to the Trustee.

8. Moreover, the Debtors are considering a final loan modification, which if approved, would govern and may require an amended plan at that time.

9. There is no reason to file an amended plan at this time.

**Respectfully submitted,**

**DATED:** February 20, 2025

**CALAIARO VALENCIK**

**BY:** /s/ Andrew K. Pratt

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**CERTIFICATE OF SERVICE OF SERVICE OF DECLARATION REGARDING NOTICE  
OF MORTGAGE PAYMENT CHANGE FILED ON JANUARY 30, 2025**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on February 20, 2025.

**Service by First-Class Mail:**

Gerald and Sandra Shaffer, 114 Well Worn Lane, Jeanette, PA 15644

**Service by NEF:**

U.S. Bank c/o Michelle Hart; [michelle.ippoliti@mccalla.com](mailto:michelle.ippoliti@mccalla.com)  
Brent J. Lemon on behalf of PNC Bank, N.A.; [blemon@kmlawgroup.com](mailto:blemon@kmlawgroup.com)  
Office of the United States Trustee; [ustregion03.pi.ecf@usdoj.gov](mailto:ustregion03.pi.ecf@usdoj.gov)  
Ronda J. Winnecour; [cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: First-Class Mail or Electronic Notification.

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

**EXECUTED ON:** February 20, 2025      **CALAIARO VALENCIK**

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